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13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA**

15 **OAKLAND DIVISION**

16 JANE DOE, individually and on behalf of all
others similarly situated,

17 *Plaintiff,*
18 *v.*

19 META PLATFORMS, INC. (f/k/a Facebook,
Inc.), a Delaware corporation,

20 *Defendant.*

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*Attorneys for Defendant Meta Platforms, Inc.
(f/k/a Facebook, Inc.)*

Case No. 4:22-cv-00051-YGR

**STIPULATION AND [PROPOSED]
ORDER RE: MOTION TO DISMISS
BRIEFING**

23 Pursuant to Civil Local Rule 7-12, the parties respectfully submit this stipulation and
24 proposed order regarding briefing on Defendant's pending motion to dismiss.

25 WHEREAS, Defendant Meta Platforms, Inc. filed a motion to dismiss on March 7,
26 2022 (Dkt. 22);

WHEREAS, pursuant to the briefing schedule adopted by the Court, Plaintiff Jane Doe's opposition to Defendant's motion is due on April 21, 2022, and Defendant's reply in support of its motion is due on June 6, 2022 (Dkt. 20);

4 WHEREAS, after reviewing Defendant's motion, Plaintiff's counsel determined that
5 the default page limit of 25 pages would not enable Plaintiff to adequately address and respond
6 to numerous complex issues raised by Defendant's motion, including but not limited to a
7 choice-of-law analysis between Burma law and California law, the availability of an immunity
8 defense under Section 230 of the Communications Decency Act of 1996, the applicable
9 causation standard for Plaintiff's products liability and negligence causes of action, the
10 application of the discovery rule and the statute of limitations, whether Defendant owed a duty
11 of care to Plaintiff and members of the proposed Class, and whether Facebook's social media
12 application constitutes a "product" under product liability law;

WHEREAS, Plaintiff's counsel has met and conferred with Defendant's counsel to request an additional ten pages for her opposition brief, for a total of 35 pages, and agreed to provide Defendant an additional ten pages for its reply brief, for a total of 25 pages;

16 || WHEREAS, Defendant does not oppose Plaintiff's request;

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** that,
18 subject to the Court's approval, Plaintiff's opposition brief may include up to 35 pages, and
19 Defendant's reply brief may include up to 25 pages.

Dated: April 19, 2022

Respectfully submitted,

By: s/ Yaman Salahi

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33 *Attorneys for Defendant Meta Platforms, Inc.*
34 *(f/k/a Facebook, Inc.)*

35 **ATTESTATION OF ELECTRONIC SIGNATURE**

36 I hereby attest that pursuant to N.D. Cal. L.R. 5-1(i)(3), I have obtained the
37 authorization from the above signatories representing Defendant to file the above-referenced
38 document, and that the above signatories concur in the filing's content.

39 /s/ Yaman Salahi

1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, IT IS HEREBY ORDERED:**

- 3 1. Plaintiff's opposition to Defendant's motion to dismiss may include up to 35 pages;
4 and,
5 2. Defendant's reply to Plaintiff's opposition may include up to 25 pages.

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7 ENTERED: _____, 2022

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Honorable Yvette Gonzalez Rogers
United States District Court

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